

Exhibit 8



Deposition of:
**Jaqueline Moline , M.D., MSc, FACP,
FACOEM**

February 26, 2020

In the Matter of:
**Zimmerman, Linda Vs. Autozone Inc.,
Et Al.**

Veritext Legal Solutions

800.808.4958 | calendar-atl@veritext.com | 770.343.9696

Page 1

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES

3 Coordinated Proceeding JCCP NO. 4674
4 Special title (Rule 3.550) Case No. BC720153

5 LAOSD ASBESTOS CASES

6 LINDA ZIMMERMAN,

7 Plaintiff,

8 vs.

AUTOZONE, INC., et al.,

Defendants.

9
10 - - -
11 Telephonic Deposition of JACQUELINE MOLINE, MD,
12 MSc, FACP, FACOEM,
13 Taken by Meghan B. Senter,
14 Before Jennifer D. Hamon,
15 Certified Court Reporter,

16 On Wednesday, February 26, 2020,
17 Beginning at 10:06 a.m. and ending at 1:42 p.m.
18 - - -
19
20
21
22
23
24
25

<p>1 APPEARANCES OF COUNSEL 2 For the Plaintiff: 3 LEAH KAGAN (Via Telephone) 4 Simon Greenstone Panatier Bartlett PC Suite 540 5 3780 Kilroy Airport Way Long Beach, CA 90806 6 562.590.3400 lkagan@sgpbllaw.com 7 8 For the Defendant Chanel: 9 MEGHAN B. SENTER (Via Telephone) 10 MG+M One Canal Place, Suite 3000 11 365 Canal Street New Orleans, LA 70130 12 504.535.2879 msenter@mgmlaw.com 13 14 For the Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.: 15 JULIA ROMANO (Via Telephone) King & Spalding 17 Suite 1600 633 West Fifth Street 18 Los Angeles, CA 90071 213.443.4365 19 jromano@kslaw.com 20 21 22 23 24 25 (Continued on next page)</p>	<p>Page 2</p> <p>1 INDEX TO PROCEEDINGS 2 EXAMINATION INDEX 3 JACQUELINE MOLINE, MD, MSC, FACP, FACOEM 4 Examination by Ms. Senter 5 Examination by Ms. Romano 61 5 Examination by Mr. Polchinski 107 Examination by Ms. Anderson-Thompson 130 6 Re-Examination by Ms. Senter 131 Re-Examination by Ms. Romano 133 7 Examination by Ms. Kagan 135 8 Certificate Page 142 9 10 EXHIBIT INDEX 11 Exhibits 12 Exhibit 1 J&J Defendants' Notice of Deposition 6 of Plaintiff's Expert Witness Dr. 13 Jacqueline Moline and Requests for Production of Documents 14 Exhibit 2 Depositions and Testimony 2015-2019, 6 15 Revised 12/19/2019 16 Exhibit 3 Curriculum Vitae 6 17 Exhibit 4 Reference List - Linda Zimmerman 6 18 Exhibit 5 Handwritten notes 6 19 Exhibit 6 Wind Rose Plot 18 20 21 (Original Exhibits 1 through 6 have been attached to the original transcript.) 22 23 (End of Index) 24 25</p>
<p>1 For the Defendants Ralphs Grocery Company and Thrifty Payless Inc. dba Rite Aid Pharmacy: 2 GABRIELLE ANDERSON-THOMPSON (Via Telephone) Barnes & Thornburg LLP 4 Suite 300 2029 Century Park East 5 Los Angeles, CA 90067 310.284.3884 6 gathompson@btlaw.com 7 For the Defendant Whittaker Clark & Daniels Inc.: 8 REBECCA BELLOW (Via Telephone) Berkes Crane Robinson & Seal 10 Suite 1500 515 South Figueroa 11 Los Angeles, CA 90071 213.955.1150 12 rbellow@berslaw.com 13 For the Defendants Revlon and Macy's: 14 PETER D. POLCHINSKI (Via Telephone) Hawkins Parnell & Young LLP 16 8th Floor 600 Lexington Avenue 17 New York, NY 10022 212.897.9655 18 ppolchinski@hpylaw.com 19 20 21 22 23 24 25</p>	<p>Page 3</p> <p>1 February 26, 2020 2 10:06 a.m. 3 (Pursuant to OCGA 15-14-37 (a) and (b) a 4 written disclosure statement was submitted 5 by the court reporter to all counsel present 6 at the deposition and is attached hereto.) 7 JACQUELINE MOLINE, MD, MSC, FACP, FACOEM, 8 being first duly sworn, was examined and 9 testified as follows:</p> <p>10 EXAMINATION</p> <p>11 BY MS. SENTER:</p> <p>12 Q Good morning, Dr. Moline. This is 13 Meghan Senter. We met via telephone just a few 14 moments ago. I think I'm going to be starting us 15 off today, and I want to cover just a little bit 16 of background. All right?</p> <p>17 A Okay.</p> <p>18 Q I promise I'm going to try not to be 19 redundant. I know you've done this a few times. 20 I'm not going to try and run you through 21 everything. But it's fair for me to kind of 22 dispense with the usual admonitions? You're 23 familiar with the process?</p> <p>24 A Yes.</p> <p>25 - - -</p>

<p>1 Q Do you recall what the substance of 2 those comments were?</p> <p>3 A Some of it was they wanted us to take 4 out some of the initial -- what we had initially 5 submitted was -- there was some quotation in some 6 of the introduction to the conclusion. They 7 asked that we add a line about whether there was 8 any genetic testing, which we did.</p> <p>9 There was a -- some clarifications I 10 think on the tables. There were some minor 11 changes. It was nothing that was not -- 12 obviously, it was nothing that prevented it from 13 being published. It was a very constructive 14 review in terms of making it clearer to the 15 reader.</p> <p>16 Q Understood. I assume that you made 17 those revisions; is that right?</p> <p>18 A When we were able to, yes. I mean, 19 sometimes the reviewer will suggest things that 20 are not possible to do, and you note that it's 21 not possible to do it. But in general, one tries 22 to be responsive to the reviewers' requests.</p> <p>23 Q Do you recall any specific request 24 made by the reviewers on this article that you 25 were unable to make?</p>	<p style="text-align: center;">Page 42</p> <p>1 correct? 2 A Correct. 3 Q And because you were a retained expert 4 on each of those 33 cases associated with the 5 paper, you do have a way of identifying each of 6 the 33 individuals described within your 7 published paper; right? 8 A I personally -- yes. I have a way of 9 identifying who is patient 1 or who is patient 10 33. 11 Q And for reasons that you can explain, 12 you will not provide the listing or any 13 information about which specific individual is 14 associated with any given case; correct? 15 MS. KAGAN: I'm sorry. Can you reask 16 the first part of the question? For reasons she 17 can or cannot explain? 18 MS. SENTER: Can. 19 BY MS. SENTER: 20 Q For reasons that Dr. Moline can state 21 in response to my question, Dr. Moline will not 22 identify the specific individuals that are the 23 subject of your paper; correct? 24 A I will not name names in this 25 deposition. That is correct.</p>
<p>1 A No. 2 Q As we go forward, I am 99 percent sure 3 that I know your answers to these questions. I 4 just have to ask them for the record. You have a 5 key for the 33 cases that are included in your 6 paper that associates those 33 cases with 7 specific plaintiffs in talc litigation; is that 8 right? 9 MS. KAGAN: Foundation, vague, and 10 argument as to "you have a fee." 11 THE WITNESS: Are you asking me if I 12 have a way of associating who is who with what's 13 described in the paper? 14 BY MS. SENTER: 15 Q Yes. 16 A Yes. I mean, I don't know if I would 17 call it a key, but yes. 18 Q So the paper talks about 33 different 19 individuals, and those were all -- those 20 individuals were all plaintiffs in litigation; 21 correct? 22 A Yes. 23 Q And for each of those 33 individuals, 24 you have been hired or retained to provide an 25 opinion in association with their litigation;</p>	<p style="text-align: center;">Page 43</p> <p>1 Q And what is the reason that you have 2 that you will not give the identities of the 3 individuals who were used in this paper? 4 A I'm following -- the paper was 5 submitted for IRB approval, Institutional Review 6 Board approval. I was -- it's to protect the 7 privacy of the individuals who we included in the 8 paper with their data in a way that it's not 9 identified in some fashion so that people can't 10 go knocking on their doors or sending them nasty 11 tweets. 12 Q When you submitted for IRB approval, 13 was the approval granted conditionally upon the 14 individuals remaining anonymous? 15 A We described that -- how we would be 16 describing the individuals, and we said that no 17 names would be included in the paper. So to that 18 extent, yes. 19 Q Would it have been possible to submit 20 the scope of this project for IRB approval 21 without the anonymity that you specified in 22 your -- 23 A I don't know. I've never tried that. 24 It's never been my practice in any of the 70 or 25 80 papers that I've published to ever include</p>

1 CERTIFICATE 2 STATE OF GEORGIA: 3 COUNTY OF COBB: 4 I hereby certify that the foregoing 5 transcript was taken down, as stated in the 6 caption, and the colloquies, questions and 7 answers were reduced to typewriting under my 8 direction; that the transcript is a true and 9 correct record of the evidence given upon said 10 proceeding. 11 I further certify that I am not a 12 relative or employee or attorney of any party, 13 nor am I financially interested in the outcome of 14 this action. 15 I have no relationship of interest in 16 this matter which would disqualify me from 17 maintaining my obligation of impartiality in 18 compliance with the Code of Professional Ethics. 19 I have no direct contract with any party 20 in this action and my compensation is based 21 solely on the terms of my subcontractor 22 agreement. 23 Nothing in the arrangements made for 24 this proceeding impacts my absolute commitment to 25 serve all parties as an impartial officer of the	Page 142
1 court. 2 This the 2nd day of March, 2020. 3 4 5 <i>Jennifer D. Hamon</i> 6 JENNIFER D. HAMON, CCR B-2287, RPR 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 143